

Response to Mayor's draft London Environment Strategy

16 November 2017

1. Introduction

The No Third Runway Coalition was set up in March 2017, bringing together a number of community groups who are opposed to expansion at Heathrow. Our members include residents, NGOs, environmental campaigners, MPs and local authorities.

The Coalition opposes expansion at Heathrow because:

- 3,750 homes will have to be demolished or rendered unliveable;
- A 3rd runway will increase the number of people severely impacted by noise from 725,000 to over 1.1million;
- London is already in breach of legal air quality limits and a 3rd runway will result in a significant increase in air pollution;
- Cost to the taxpayer remain unknown;
- Growth at other airports would need to be curbed to ensure compliance with climate change targets.

Communities around Heathrow already suffer from excessive illegal levels of air pollution. A three-runway Heathrow, however, would have severe air quality impacts and would increase congestion and emissions on local public transport and road networks.

General Questions

1. Do you agree with the overall vision and principles of this draft London Environment Strategy?

We welcome the aim for London to have the best air quality of any major world city by 2050 and applaud the commitment to going beyond the legal requirements to protect human health and minimise inequalities.

The commitment to moving beyond business as usual to protect and improve London's environment is timely. It is vital that the strategy delivers strongly and does not simply seek to minimise negative impacts of future environmental change.

In particular, we welcome the aim to reduce the number of people adversely impacted by noise. It is evident that the Mayor's continued and strident opposition to expansion at Heathrow can play a significant role in helping to deliver on this aim.

2. To achieve the policies and proposals in this strategy, which organisations should the Mayor call upon to do more (for example central and local government and business) and what should the priorities be?

The Mayor must call upon central government to scrap its support for expansion at Heathrow.

The Mayor should ask that government demonstrate how it intends on meeting legally binding climate change and air quality targets. This should include the setting of specific decarbonisation targets for non-transport sectors of the economy that will be required if expansion at Heathrow takes place.

The Mayor should also call upon central government to follow his lead in addressing London's air pollution crisis. It is simply not good enough for central government to seek to pass the buck to local government that does not have the resource, finances or capacity to address a problem that does not respect borough boundaries.

3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?

Yes.

4. There are a number of targets and milestones in this draft London Environment Strategy, what do you think are the main key performance indicators that would demonstrate progress against this integrated strategy?

No comment.

5. What are the most important changes Londoners may need to make to achieve the outcomes and ambition for this strategy? What are the best ways to support them to do this?

No comment.

Air Quality

- *Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emission transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?*

The Coalition welcome **Objective 4.2** that seeks to meet legal limits on air quality as soon as possible.

In Proposal 4.2.2b on Heathrow the Mayor has set out some key tests that supports his policy of opposition to expansion. It is clear from the government's latest appraisal of the scheme (in the updated National Policy Statement on Airports) that expansion at Heathrow results in a 'high risk' of exceeding legal air quality limits.

It's beyond doubt that expansion would worsen pollution compared with a no-expansion future. Analysis by the Airports Commission (2014) found that by 2030:

- The scheme would increase emissions of nitrogen oxides by 26% above the 'do minimum' two-runway scenario predominantly as a result of increased aircraft emissions;
- Expected exceedences of the National Emissions Ceiling Directive (NECD) limits for both NO_x and particulate matter would be exacerbated by expansion. The UK has so far been compliant with the NECD but current projections suggest future breaches are likely.

The Airports Commission Report showed that, without mitigation, Heathrow expansion would lead to the Bath Road having the worst NO₂ concentrations in Greater London. Government has since failed to demonstrate that a three-runway Heathrow won't have the worst NO₂ concentrations in Greater London - risking the compliance of the zone and EU fines on the UK.

The updated NPS on Airports accepts that without effective mitigation that expansion will result in both an increase in congestion and emissions.

The Government has failed to demonstrate that Heathrow expansion can be consistent with legal obligations on air quality In particular, it is unclear why any airport expansion should start before air quality has been consistently met at all nearby sites.

The Mayor should seek to increase the fees on existing road user charging schemes to help facilitate the switch to a ultra low carbon vehicles. In particular, there should be a new charge zone around Heathrow airport – perhaps as part of the extension of the ULEZ to incorporate the boundaries of those boroughs closest to the airport.

Both the Airports Commission and TfL have suggested that if Heathrow expands and expects to deliver zero increase in airport related traffic, a road

user-charging scheme (at around £40) would be required around the airport. This would be in addition to existing London congestion-charging schemes.

Proposal 4.2.1 on freight will be particularly important should expansion at Heathrow occur owing to the significant increase in freight traffic on London's roads.

The Mayor could seek further powers that enable his office to levy fines on businesses that are significant polluters should they fail to decarbonise sufficiently quickly or who seek to flout air quality limits.

The Mayor could be even more ambitious in some the deadlines set in the plan. For example, he could bring forward the deadline to remove diesel vehicles from London to 2025 rather than 2030. Additionally, such bans on diesel vehicles could be introduced at specific air quality hotspot even earlier, say by 2020.

The establishment of a zero emission zone around Heathrow airport by 2025 would provide significant assistance to the delivery of the Mayor's wider ambitions for London.

- *Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?*

The Coalition welcome proposal 4.1.1a to provide better information about air quality and would be keen to work with the Mayor's office to deliver this proposal.

- *Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?*

Yes.

- *Would you support emergency measures, such as short-term road closures or vehicle restriction, during the periods of worst air pollution (normally once or twice a year)?*

Yes, particularly on local roads around Heathrow. Analysis by TfL shows that a third runway at Heathrow would result in increased delays at junctions and average speeds becoming slower on the local road network. This would inevitably result in an increase in emission, potentially ensuring that parts of West London would require emergency measures all year round to alleviate the levels of air pollution.

- *Do you agree with the proposed approach to reducing emissions from non-transport sources (including new buildings, construction equipment, rail and river vehicles and solid fuel burning)?*

The proposed approach seems sensible and comprehensive.

- *Please provide any further comments on the policies and programmes mentioned in this chapter.*

Proposal 4.2.1 on freight will be particularly important should expansion at Heathrow occur owing to the significant increase in freight traffic on London's roads.

It is interesting to note that the Health Impact Assessment has concluded that there would be no negative effects on air quality from the Mayor's policies.

The Mayor's calls on government combined in Policy 4.2.4b are comprehensive and if implemented would make significant progress towards meeting legal limits. It would be useful to know what plans the Mayor has to ensure that his suggestions are incorporated into central government strategies.

Climate Change Mitigation and Strategy

- *Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?*

It is difficult to state with confidence that the proposals will ensure that London is a zero carbon city by 2050. This is due to the large proportion of emissions that are generated by sectors of the economy (energy, manufacturing) that sit outside of the remit of the Mayor of London.

The threefold increase in the rate of emissions reduction is complex and challenging and is heavily reliant on concerted action by government at a national level.

There are serious concerns about the Government's Clean Growth Strategy given that aviation emissions are barely mentioned. All reputable evidence to date indicates that keeping aviation emissions to 2005 levels will be challenging even without runway expansion. In its progress [report](#) to Government in June 2017, the CCC had the following to say on aviation:

"If aviation emissions are anticipated to be higher than 2005 levels – as in the central case in the business case for an additional runway at Heathrow airport – then other sectors would have to plan for correspondingly higher emissions reductions. We would expect to see this reflected in the Government's plan for meeting the fourth and fifth carbon budgets."

To date there has been no evidence produced by government that would instil confidence that the fourth and fifth carbon budgets will contain the measures necessary to achieve such reduction. Indeed, rather than providing any detail, the clean growth strategy simply seems to imply that the emissions levels can be met as long as action is taken in other sectors.

It appears that the Government has now calculated that anticipated emissions cuts from other sectors will not only be met but also exceeded. It should make publicly available any work undertaken that supports such a conclusion.

It is crucial that those sectors of the economy that will be required to pick up the shortfall caused by growth in aviation emission. In particular, Parliament should be made aware of what the likely impact will be on consumers' bills.

Heathrow airport, already responsible for half the total emissions from UK aviation, must not be allowed to expand until the Government has an answer on how to tackle the sector's CO₂. The strategy effectively admits that it's not possible to meet the CCC's recommendation for keeping aircraft emissions within the limits of the Climate Change Act while building a third runway, but seems to have no answer on how it will account for this.

The failure to address this issue is a serious abdication of Government responsibility.

- *To achieve the Mayor's zero carbon ambition we estimate (between now and 2050), up to 100,000 homes will need to be retrofitted every year with energy efficiency measures. Do you agree with the Mayor's policies and proposals to achieve his contribution to this? What more can central government and others do to achieve this?*

The ambition seems sensible.

- *Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?*

No Comment.

- *Please provide any further comments on the policies and programmes mentioned in this chapter, including those in the draft solar action plan and draft fuel poverty action plan that accompany this strategy.*

Climate Change Adaptation

- *Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?*

The policies and proposals seem appropriate.

- *Do you agree with the Mayor's policies and proposals to make Londoners, more aware of the risks of climate change, like overheating in buildings and flooding following heavy downpours?*

Absolutely.

- *Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?*

No comment.

- *What do you see as the biggest opportunities to tackle climate change risks in London and how can the Mayor support this?*

No comment.

- *Please provide any further comments on the policies and programmes mentioned in this chapter.*

No comment.

Ambient Noise

- *Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?*

The Mayor should lobby central government to introduce noise mitigation measures tailored specifically for aircraft noise. Currently, the DfT relies on a figure for calculating compensation based on road traffic – this is clearly unacceptable for communities next to airports where the noise from aircraft engines is many magnitudes more intrusive.

It would also be beneficial if the Mayor could ask the government to produce an assessment of the impact of aircraft noise from flights lower than 3,000m. Changes to airspace and approach paths mean that larger 'quieter' aircraft may be flying lower over many communities. This has the potential to significantly worsen the noise level experience by Londoners in many parts of the city.

- *Do you think that the boroughs and the Mayor have sufficient powers to manage noise across London? If not, what additional powers are required and which organisation should hold them?*

The Mayor should seek to have representation on the Independent Noise Ombudsman once established to ensure that the views of city hall are

reflected in the workings of this new body. If the appropriate sanctioning powers are not included in this body then the Mayor should seek to acquire them to ensure that city hall has the capability of leading on this key issue.

- *Do you agree with the Mayor's policies and proposals to improve Londoners' awareness of the health risks of noise?*

Yes, improving the awareness of the health risks of noise is vital to broadening understanding of the negative impacts of aircraft noise. In particular, the negative impacts of children's cognitive abilities and disruption to their learning environment should be communicated more effectively.

Unfortunately, the NPS process has only undertaken a Health Impact Analysis of the impact of expansion at Heathrow on the health of local communities. A full Health Impact Assessment should be undertaken before a parliamentary vote is taken on the NPS.

The Airports Commission report assessed the effects of a third runway at Heathrow as moderately adverse for health outcomes (including mental and physical health) and majorly adverse for children's cognitive development. The draft NPS has failed to give sufficient weight to these very serious impacts.

The Mayor should lobby central government to for specific and proven mitigations to be introduced that ensures that there is no increase in adverse health and educational impacts.

- *Please provide any further comments on the policies and programmes mentioned in this chapter.*

We welcome the Mayor's opposition to expansion at Heathrow as stated in Policies 9.1.2c and 9.1.2e.

A 3rd runway would mean another 250,000 planes a year using Heathrow. It is worth noting that it is the number of aircraft causing noise disturbance that causes the annoyance.

Further, a low flying 'quieter' aircraft can be much noisier on the ground than a higher-flying 'noisier' aircraft.

The noise mitigation package offered by Heathrow is lamentably insufficient and is not available for the majority of people who will be significantly impacted by aviation noise.

Communities blighted by noise pollution deserve truly world-class mitigation today - not a decade or more after the third runway has opened.